

Exhibit E

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Plaintiffs,

ROB BONTA, in his official capacity as
Attorney General of California,

Case No.: 8:23-cv-01798

1 I, Brandon Combs, declare:

2 1. I am over 18 years old. I am competent to give this declaration. I am
3 providing this declaration based on my personal knowledge and experience.

4 2. I am the president of Firearms Policy Coalition, Inc. (“FPC”), a non-
5 profit membership organization incorporated under the laws of Delaware with a
6 primary place of business in Clark County, Nevada. In my role as president, I am
7 familiar with FPC’s purposes as an organization and FPC’s membership.

8 3. The purposes of FPC are to create a world of maximal human liberty and
9 freedom and to promote and protect individual liberty, private property, and economic
10 freedoms. It seeks to protect, defend, and advance the People’s rights, especially but
11 not limited to the inalienable, fundamental, and individual right to keep and bear arms
12 and protect the means by which individuals may exercise the right to carry and use
13 firearms.

14 4. FPC serves its members and the public through legislative advocacy,
15 grassroots advocacy, litigation and legal efforts, research, education, outreach, and
16 other programs.

17 5. FPC’s has members that reside both within and outside the State of
18 California, including in Orange County, California, and San Diego County,
19 California. Each of the named individual Plaintiffs in this case are members of FPC.

20 6. FPC represents the interests of its members and brings this action on
21 behalf of its members.

22 7. FPC’s members and supporters have been adversely and directly harmed
23 by Defendant’s threat of enforcement of SB2.

24 8. On September 26, 2023, California Governor Gavin Newsom signed SB2
25 into law, which prohibits carry in many public locations, including restaurants, bars,
26 public transportation, stadiums, libraries, museums, zoos, amusement parks, medical
27 facilities, gambling establishments, and more. SB2 also imposes a no-carry default on
28

1 private businesses open to the public, prohibiting carry there unless the business owner
2 expressly provides otherwise.

3 9. FPC's members will be adversely and directly harmed by Defendant's
4 enforcement of the law challenged herein once SB2 takes effect on January 1, 2024.
5 Indeed, FPC has members who have a California carry license and have, currently do,
6 and would continue to carry in the locations challenged in this lawsuit—including the
7 individual named Plaintiffs—on and after January 1, 2024, but for the enforcement of
8 and reasonable fear prosecution under SB2.

9 I declare under penalty of perjury under the laws of the United States of
10 America and State of California that the foregoing is true and correct to the best of my
11 knowledge. Executed in Clark County, Nevada, on September 26, 2023.

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15 BRANDON COMBS
16 President
17 Firearms Policy Coalition, Inc.
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